

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

Richmond Division



Case No.

3:24cv608

(to be filled in by the Clerk's Office)

Heita M JAMES-IRVUN & (J.M.D.M.)  
(W.W.M., Jr.)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one) ☐ Yes ☐ No

Muslims of America (ETAL)

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Heita M JAMES IRVUN

Street Address

448 MONROE AVE

City and County

Buffalo, NY 14211

State and Zip Code

Telephone Number

(716) 203-5167

E-mail Address

BKandCompany@protonmail.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## Defendant No. 1

Name  
 Job or Title (if known)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address (if known)

The Muslims of America  
 (\*)(ROC Nation) (Dagge) ~~SHAWN CARTER~~  
 540 W 26<sup>th</sup> ST, New York NY  
 New York  
 New York 10001

## Defendant No. 2

Name  
 Job or Title (if known)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address (if known)

JEFFREES funeral Home owner  
 MRS Barksdale ~~owner~~  
 304 Lusardi Dr  
 Brookneal  
 VA, 24528  
 (Attn) CURTIS JONES

## Defendant No. 3

Name  
 Job or Title (if known)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address (if known)

Bon Secours Richmond Community Hospital  
 (Admin) (Michelle OBAMA)  
 1500 N 28<sup>th</sup> ST (Richmond VA)  
 Richmond  
 VA 23223

## Defendant No. 4

Name  
 Job or Title (if known)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address (if known)

Def Jam <sup>Attn</sup> (Russell Simmons)  
 (All Presidents) former & present  
 1755 Broadway  
 NY  
 New York 10019

Twitter (ELON MUSK)

1355 MARKET ST  
SAN FRANCISCO CA

BIA (BUREAU OF INDIAN AFFAIRS)  
1849 C ST NW  
WASHINGTON DC 20240

→ ~~ALLEN~~  
(KAMALA HARRIS)

~~PHILIP (SHARON) CARTER~~ sue

Grand Lodge of Virginia (MASONRY)

4115 nine mile RD  
Richmond VA 23223

(ATTN) ~~SHARON~~ DEWAYNE  
CARTER

Alvin Robinson

115 Gold St  
Buffalo NY 14206

~~PHILIP~~ Lamont Cooper / & ~~PHILIP~~ Cassandra Cooper (same address)  
~~PHILIP~~ 2594 Loganville Hwy  
Grayson GA 30017  
SPOUSE

Calvin Stallworth

2594 Loganville Hwy  
Grayson GA 30

Donald Trump = ~~ALBEMARLE~~ ALBEMARLE  
Charlottesville, VA

~~ALBEMARLE~~

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A.**

**If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

# 1983 MITCHELL

§ 1983 U.S.C. § 42 (Depriving of Human Rights)

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Heila, is a citizen of the  
State of (name) New York.

**b. If the plaintiff is a corporation**

The plaintiff, (name) \_\_\_\_\_, is incorporated  
under the laws of the State of (name) \_\_\_\_\_,  
and has its principal place of business in the State of (name) \_\_\_\_\_.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, (name) \_\_\_\_\_, is a citizen of  
the State of (name) \_\_\_\_\_. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

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b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

\$800 Billion

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

petitioner/plaintiff Keita M James Irvin Heir From Howard Snell was groomed & sexually exploited since a child by group due to being a descendant to Heir that is the property owner of REOHUSE, VA. Group has used law enforcement, hospitals, doctors, violated health including eye surgery transplants on Heir children, acting in terrorist behaviors, some resulting in murder, group has caused severe pain & suffering to Snell, Mitchell, Ford Heirs including using state to kidnap children for plaintiff refusing. Threat of passport, identity signature forge, Includes, politicians, law enforcement, agents, sheriffs, mass media events, celebrities etc.

### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

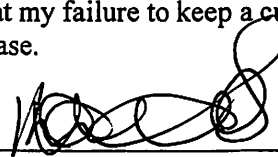
**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**


I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: \_\_\_\_\_


 8/26/2024

Signature of Plaintiff \_\_\_\_\_

Printed Name of Plaintiff \_\_\_\_\_

  
 HELEN M JAMES - IRVIN
**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney \_\_\_\_\_

Printed Name of Attorney \_\_\_\_\_

Bar Number \_\_\_\_\_

Name of Law Firm \_\_\_\_\_

Street Address \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_